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Celanese Plastics & Specialties Company
a Division of Celanese Corporation
1065 West Hill Street
P.O. Box 8248
Louisville, Kentucky 40208
502 585-8011

December 1, 1980

Jack A. Wilson, Commissioner
Kentucky Department for Natural
Resources and Environmental Protection
Frankfort, Kentucky 40601

Dear Commissioner Wilson:

Following up on my letter of October 16, 1980, Celanese representatives made a second visit to the A. L. Taylor waste disposal site on October 28, 1980. In the company of Mr. Robert Keontop, a field inspector from your Department, representative samples were taken from the drums and tins tentatively identified as originating from the Celanese Louisville plant.

The 108 drums and approximately 75 tins were found to have the contents shown on the attached list. Although most of these drums and tins appear to have been used at one time at the Celanese plant, either for product or other purposes, there is no indication in our records that any of the drums were directed to the A. L. Taylor site by Celanese. We are not able to determine who sent each of these drums and tins to the site.

Nevertheless, in the interest of promoting sound environmental clean-up practices, Celanese will voluntarily undertake the responsible disposal of the listed drums and tins in accordance with current regulations. Our analyses and records indicate that the contents of these drums and tins are compatible with the wastes currently generated by the Louisville plant. We therefore propose that Celanese be permitted to remove the drums and tins from the A. L. Taylor site, to transport them to the Louisville plant for temporary storage and to dispose of them in the normal course of operations at the plant.

The Louisville plant has filed a preliminary notification to EPA under Section 3010 of the Resource Conservation and Recovery Act, and has filed a Part A permit application as a hazardous waste storage facility. We believe our existing storage practices and our disposal contracts are adequate to handle the listed drums and tins.

- Continued -

Your Department's cooperation has been greatly appreciated, particularly Mr. Keontop's assistance in identifying and sampling the drums. If any further information is needed, please contact our Environmental Engineer at the Louisville plant, Tom Pentecost at 502-585-8791.

Sincerely,

A handwritten signature in dark ink, appearing to read "Emory M. Davis", with a stylized flourish at the end.

Emory M. Davis
Vice President and
General Manager, Resins

EMD/hm